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May 14, 2021

File No. 37986.4139

**VIA ECF**

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 518  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 5/17/2021

Re: *Rubio v. BSDB Management Inc. et al*  
Civil Case No. 1:19-cv-11880-VSB

Dear Judge Broderick:

We represent Defendants BSDB Management Inc., Marvin Neiman, and Dov Lebovic in the above-referenced matter. We write jointly with Plaintiff to request an extension of time to submit the executed settlement agreement and fairness application from May 17 until May 24, 2021. The reason for this request is that the parties are still negotiating the substantive terms of the settlement agreement and Defendants are unavailable today until Tuesday because of religious observance. This is the parties' third request for an extension of time to submit the settlement approval application.

We thank the Court for its time and attention to this matter.

Respectfully,

/s/ Adam E. Collyer

Adam E. Collyer of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

cc: Counsel for Plaintiff (via ECF)